EXHIBIT B

p. 7-12

available materials; photographs; federal, state or local government filings, licenses, applications or registrations (other than that at the U.S. Patent and Trademark Office); mailings; trade show materials; personal contacts; telephone calls; Web sites; signs; letterhead; envelopes and business cards.

REQUEST NO. 16

Copies of all documents relating to the Settlement Agreement between Plaintiff and Defendant of March 2005, including but not limited to documents relating to the negotiation of the Settlement Agreement and documents referring to or discussing compliance with the Settlement Agreement.

REQUEST NO. 17

Copies of all correspondence with purchasers or resellers of Defendant's prosciutto products since August 1, 2003 not previously provided to Plaintiff.

REQUEST NO. 18

Copies of all communications between Defendant and any other person concerning any trademark or certification mark in connection with San Daniele prosciutto since August 1, 2003 not previously provided to Plaintiff.

REQUEST NO. 19

Copies of any correspondence with, or documents concerning, Pasta Cheese Gourmet Food Shop, Portuguesefood.com, avwinery.com, or pagelinx.com.

REQUEST NO. 20

Copies of all communications between Defendant and any other person concerning the Consorzio del Prosciutto di San Daniele since August 1, 2003 not previously provided to Plaintiff.

REQUEST NO. 21

Copies of all drafts of settlement agreements or proposals for settlement agreements between Defendant and the Consorzio del Prosciutto di San Daniele, and any changes made or proposed by any party thereto, in connection with the Settlement Agreement of August 2003 or the Settlement Agreement of March 2005 between Plaintiff and Defendant.

REQUEST NO. 22

Copies of all opinions, legal opinions and other advice concerning any of the following alleged trademarks: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

REQUEST NO.23

Copies of all documents reflecting expenditures or proposed expenditures by Defendant, or on its behalf, to promote GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, or RISERVA as trademarks, including but not limited to financial statements, budgets, forecasts and projections, from the date of first use of the mark to the present.

REQUEST NO. 24

Copies of documents supporting the sales by Defendant provided in response to Plaintiff's Interrogatory No. 11.

REQUEST NO. 25

Copies of all documents on which Defendant relies in its responses to Plaintiff's First Set of Interrogatories Propounded to Plaintiff.

REQUEST NO. 26

Copies of all market research, including but not limited to surveys, relating to the designation or trademark DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, or RISERVA.

REQUEST NO. 27

Copies of all documents showing or referring to any confusion between prosciutto sold by Defendant and prosciutto sold under the certification mark of the Consorzio del Prosciutto di San Daniele.

REQUEST NO. 28

Copies of all documents showing or referring to any confusion as to the geographic origin of prosciutto sold by Defendant.

REQUEST NO. 29

Copies of all orders by Defendant for labels or packages bearing any of the marks DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA since January 1, 2005.

REQUEST NO. 30

Copies of all correspondence concerning Defendant's orders of labels, promotional materials or advertising materials relating in whole or in part to prosciutto since January 1, 2005.

REQUEST NO. 31

Copies of all documents containing specifications by Defendant for labels or packages bearing any of the marks DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA since January 1, 2005.

REQUEST NO. 32

Copies of all documents on which Defendant intends to rely to support its contention that each of the following is a valid trademark in the United States: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

REQUEST NO. 33

Copies of all documents showing the use by Defendant of any of the following as trademarks in connection with the sale of prosciutto in the United States: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

REQUEST NO. 34

Copies of all documents in which you have requested resellers of your prosciutto to cease use of the DANIELE trademark in connection with the sale of prosciutto.

REQUEST NO. 35

Copies of all documents suggesting that anyone thought or asked whether, Defendant's prosciutto is produced in San Daniele or whether Defendant is connected in any way with San Daniele or the Consorzio del Prosciutto di San Daniele.

REQUEST NO. 36

A copy of any written report, study, or summary made by an expert whom Defendant expects to call as a witness at the trial of this matter.

REQUEST NO. 37

Any written or recorded statement you obtained from any individual concerning the allegations contained in this lawsuit.

REQUEST NO. 38

Copies of documents showing the prices for Defendant's prosciutto products from January 1, 2005 to the present.

REQUEST NO. 39

Copies of all documents generated or received by Defendant in connection with the design and adoption of each of the following designations: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

REQUEST NO. 40

Copies of all contracts for the sale, distribution or advertisement of prosciutto by Defendant.

REQUEST NO. 41

Copies of all applications, registrations, and documents relating thereto, not already provided to Plaintiff, with respect to the registration of the following terms: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

REQUEST NO. 42

Copies of all versions of Defendant's Web site; copies of documents showing the dates of use of each version of Defendant's Web site with the dates of use of each version; copies of all documents concerning the Web site; and copies of all documents reflecting or relating to changes to the Web site.

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Dated: May , 2007

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May, 2007, I caused to be served via hand delivery a copy of the foregoing Plaintiff's First Request for Production of Documents Propounded to Defendant to Girard R. Visconti, Esq., Visconti and Boren, Ltd., 55 Dorrance Street, Providence, RI 02903.

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